

April 24, 2023

Lyric Jorgenson, PhD  
Acting Director, Office of Science Policy and  
Acting NIH Associate Director for Science Policy  
The National Institutes of Health  
6705 Rockledge Drive, Suite 630  
Bethesda, MD 20892

**RE: SIAM Comments Response to NOT-OD-23-091, Request for Information on the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research**

*Comments transmitted electronically via [RFI Web form](#) on April 24, 2023*

Dear Dr. Jorgenson,

The Society for Industrial and Applied Mathematics (SIAM) appreciates the opportunity to provide comments in response to [NOT-OD-23-091, Request for Information on the NIH Plan to Enhance Public Access to the Results of NIH-Supported Research](#). SIAM is an international community of over 14,500 members from academia, industry, and government. Members come from many different disciplines, and all have a common interest in applying mathematics, computational science, and data science towards solving real-world problems. SIAM is committed to ensuring that the highest quality research is readily available to enhance the nation's research enterprise.

SIAM appreciates NIH's thoughtfulness in developing public access plans. Independent, non-profit, discipline-specific, professional societies and publishers such as SIAM foster focused and creative communities that enable professional development, build new research connections, and enhance workforce development, adding immense value to the scientific field and publishing ecosystem. Publishing is a critical part of SIAM's impact and also the largest source of income for the organization, which has also faced rising expenses in recent years due to the COVID-19 pandemic and other economic factors. As NIH and other federal agencies consider updated open access plans, it is critical to be cognizant of the future of small, independent, society publishers and their larger impact and importance to the research community. We appreciate NIH's commitment to broad engagement of the scientific community and nonprofit scholarly publishers of all sizes.

Supporting a balanced ecosystem of journals is crucial for the vitality of the research community. SIAM applauds the NIH Public Access Plan in allowing authors to submit the author accepted manuscript as the deposited version, rather than the version of record. This helps safeguard SIAM's income stream, allowing for continued reinvestment in the current 18 peer-

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reviewed research journals, which are the leading source of knowledge for the world's applied mathematics, computational science, and data science communities. In addition, SIAM employs very liberal green open-access policies in line with the NIH's public access vision while most articles are available as preprints on relevant repositories. SIAM is appreciative that the Creative Commons Attribution License (CC-BY) is not mandated for the author accepted manuscript, remaining aligned with NIH's current Data Management and Sharing policy and not creating unnecessary barriers for authors and society publishers.

SIAM encourages NIH to continue to monitor the impact of open access models on the financial sustainability of federal grants as well as nonprofit society publishers in order to ensure continued independence and high standards. Openness must always be combined with quality and trust.

Equity must be placed at the heart of any open access funding model – it is critical, particularly in the disciplines that SIAM serves, that authors are able to publish their research in their journal of choice regardless of the author's ability to pay or the institutional open access agreements that may – or may not – be in place. Current gold Open Access models such as APCs and read & publish transformative agreements risk creating a two-tier system where researchers from well-funded institutions and/or disciplines and/or countries get open access, while the rest do not. Such barriers go against the core scholarly publishing principle that the best ideas should be published and promoted wherever they come from. SIAM is actively working on developing an open access model that is equitable, sustainable, as simple as possible to administer, and does not erect any barriers for authors globally.

SIAM commends NIH for its leadership in engaging the community and adapting the plan for public access to allow researchers and societies to produce research free from unnecessary burdens and easily accessible by the public. As the leader in industrial and applied mathematics research, SIAM stands ready to continue to be a resource as NIH crafts public access policies that impact independent society publishers and the wider publishing landscape.

Sincerely,

Dr. Suzanne L. Weekes

Executive Director, Society for Industrial and Applied Mathematics